

STEVEN C. HOLTZMAN (State Bar No. 144177)  
sholtzman@bsflpp.com  
BOIES, SCHILLER & FLEXNER LLP  
1999 Harrison Street, Suite 900  
Oakland, CA 94612  
Telephone: (510) 874-1000  
Facsimile: (510) 874-1460

DAVID A. BARRETT (*pro hac vice*)  
dbarrett@bsfllp.com  
BOIES, SCHILLER & FLEXNER LLP  
575 Lexington Ave., 7th Floor  
New York, NY 10022  
Telephone: (212) 446-2300  
Facsimile: (212) 446-2350

D. MICHAEL UNDERHILL (*pro hac vice*)  
munderhill@bsflpp.com  
BOIES, SCHILLER & FLEXNER LLP  
5301 Wisconsin Avenue NW  
Washington, D.C. 20015  
Telephone: (202) 237-2727  
Facsimile: (202) 237-6131

Attorneys for Defendant  
CONNECTU, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

# THE FACEBOOK, INC. and MARK ZUCKERBERG,

**Plaintiffs,**

V.

CONNECTU, INC. (formerly known as CONNECTU, LLC), PACIFIC NORTHWEST SOFTWARE, INC., WINSTON WILLIAMS, and WAYNE CHANG.

### Defendants.

Case No. 5:07-CV-01389-JW

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO SEAL:**

**CONFIDENTIAL EXHIBITS  
(EXHIBITS A, F, H, I, J, K, AND N)  
TO DECLARATION OF  
EVAN A. PARKE IN SUPPORT OF  
DEFENDANTS' RESPONSE TO ORDER  
TO SHOW CAUSE**

1 Pursuant to Civil L.R. 7-11 and 79-5, Defendants respectfully submit this  
2 administrative motion asking the Court to file under seal the “Confidential Exhibits  
3 (Exhibits A, F, H, I, J, K, and N) to Declaration of Evan A. Parke in Support of  
4 Defendants’ Response to Order to Show Cause” (“Defendants’ Confidential Exhibits”).

5 The parties entered into, and the Superior Court of California, Superior County  
6 issued, a Stipulated Protective Order on January 23, 2006, prohibiting either party from  
7 filing in the public record any documents that have been designated as “Confidential” or  
8 “Highly Confidential” pursuant to the protective order.

9 Defendants’ Confidential Exhibits contain (i) information that the Court has  
10 Ordered should be sealed, including the financial terms of the purported settlement  
11 between Plaintiffs and Defendants (*see* Order conditionally granting CNET’s request to  
12 unseal, at Dkt. No. 473); (ii) information that has been designated by Plaintiffs as  
13 Confidential or Highly Confidential and covered by the Protective Order; (iii)  
14 information that the Master has designated as confidential in prior filings (*see* Dkt. No.  
15 632); and/or (iv) information alleged by Plaintiffs to implicate confidentiality provisions  
16 found in a purported settlement agreement which is the subject of dispute between the  
17 parties.<sup>1</sup>

18 Defendants’ respectfully request that Defendants’ Confidential Exhibits remain  
19 sealed.

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27 <sup>1</sup> By filing this request to seal, Defendants do not waive any arguments or rights as to the admissibility or  
28 inadmissibility of evidence surrounding the purported agreement, nor do they waive any arguments or  
rights as to the enforceability or unenforceability of the purported agreement.

October 14, 2008

Respectfully submitted,

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*/s/Steven C. Holtzman*  
Steven C. Holtzman  
BOIES, SCHILLER & FLEXNER LLP

**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 14, 2008.

Dated: October 14, 2008

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*/s/ Steven C. Holtzman*  
Steven C. Holtzman  
Attorney for Defendant ConnectU, Inc.